

March 1, 2001

Kenneth Parr
US Bureau of Reclamation
Rapid City Field Office
515 9th Street, Room 101
Rapid City, SD 57701

Re: Angostura Unit, Draft EIS

Dear Mr. Parr,

Thank you for the opportunity to review the Draft EIS for the Angostura Unit. I have the following comments to offer.

The Cheyenne River watershed is a unique situation in that point and non-point source contributions from upstream of Angostura Reservoir are collected and stored in the reservoir. Then they are released into an irrigation canal or the Cheyenne River downstream of the dam in what must be considered as a point source for water quality purposes. Further, the return flows from the irrigated lands are returned to the Cheyenne River in a combination of point and non-point sources downstream of the dam.

- 1 The Cheyenne River is an impacted river downstream of the Angostura dam. [A Total Maximum Daily Load (TMDL) should be established for multiple water quality parameters for the river.] Until the loadings from point and non-point sources to the Cheyenne River are properly separated and quantified, the actual impact of individual operations such as the Angostura Reservoir, irrigation return flows, and watershed runoff cannot be determined. Once the loadings are separated by proper study, the individual source impacts can be determined and improvement of point source operations along with non-point source best management practices can be addressed.

- 2 [Repeatedly throughout the Draft EIS and in the Appendices Q, T, and Z, the case is made that there is a lack of integrated flow and concentration data over a reasonably continuous period of time to properly evaluate the current impacted condition of the Cheyenne River. The Table S.1 summarizes modeled impacts of the considered alternatives. The Draft EIS implies (although data is insufficient and the relationships are highly extrapolated over time and distance) that the presented evaluation at least compares the impact of the alternatives for the developed hypothetical situation. The actual impact of choosing any of the alternatives is not currently known and will not be determined with the current database of information.]

It would seem, that a valid approach to recontracting the Angostura Unit would be to enter into a short term contract that allowed concurrent scientific establishment of baseline water quality conditions, and also allowed for evaluation of proposed system efficiencies and best management practices.

- 3 [If proper funding were in place at the initiation of the recontracting period, I would suggest that a five-year time period would be appropriate to complete necessary TMDL studies and to evaluate different flow scenarios to determine the best benefit environmentally to Angostura Reservoir and the Cheyenne River. Also, methods of improving the irrigation system could be defined, specified, and evaluated during this time period.]

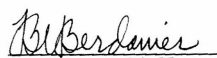
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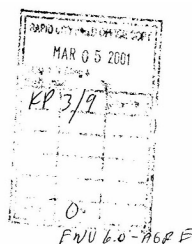
Angostura Unit, Draft EIS

- 4 [I also noted that no discussion of mitigation measures for identified impacts were included in the Draft EIS.]

I think that BOR and the cooperating agencies have done a great job of compiling the available information for this study area and cooperating in completion of this report. I hope that the next step in recontracting the Angostura Unit will include provisions for actual study and evaluation of ongoing impacts to the reservoir and the river. I also hope that the recontracting will include sufficient flexibility to implement improvements to the system based on the study results. I have greatly appreciated the opportunity to participate in this process for the Angostura Unit. Please do not hesitate to contact me if I can be of further assistance.

Sincerely,


Bruce W. Berdanier, PhD, PE



1. Reclamation doesn't have authority to establish TMDLs. The methodology used in the EIS analysis does recognize the intervening point and nonpoint loads, the latter of which constitute virtually all of the sources in the Angostura area. Although the recognition is not explicit, it is inherent in the interrelationships developed for the impact analysis. Admittedly, it is based on historic conditions. However, the recommendation for a five year study would develop a similar historic record which would suffer from the same inherent problems as the method used, that is, it would assume that these conditions would represent the future, the impact analysis period. It would also require that relationships similar to those used in the impact analysis would still have to be developed to perform an impact analysis.

2. For the reasons stated in the response to comment No. 1, no matter how much better data would be gathered, the effect would be similar. The data would have to be extrapolated at least over time, and probably over space, to perform an impact analysis. Reclamation believes the available data are adequate for the analysis and that the analysis presents a fair comparison of the impacts of the various alternatives.

3. Gathering another five years of data—with or without TMDLs—probably wouldn't change the analysis or findings in the EIS. As stated in the response to comment No. 1, TMDL studies should be initiated by the State or the Tribes.

4. The Improved Efficiencies Alternative, selected as the Preferred Alternative, would include measures to institute BMPs and to implement water conservation, would make water available for other uses besides irrigation, and would set up a public process to determine uses for the saved water (pp. 22-24 in the EIS). Also, analyses in the EIS determined that impacts of the Improved Efficiencies Alternative wouldn't be significant and thus wouldn't warrant mitigation beyond that described in the alternative.

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Feb 23, 2001

U.S. Bureau of Reclamation
Rapid City Field Office
515 9th St. Room 101
Rapid City, S.D. 57701

Dear Kenneth Parr:

We are responding to the D.E.I.S.
we recieved in the mail.

1. [Our first alternative is —

(No Action Alternative)]

We have lived on the Angostura
Irrigation District for 45 years.
Developing what we thought was
positive future on this land. After
being to a number of meetings and
finally getting a copy of the impact
Statement, we have some great
concerns as land owners under
the Bureau of Reclamation control.

2. [We felt as time went along we
would have gained equity in the
structures that have been paid on
(Dam & Delivery) for many years.]

Now with recreation making many
more dollars than the irrigation there
seems to be a swing toward that side

3. of the reservoir. [Game Fish & Parks pays
no money to the Bureau of Reclamation
for their lease and they bring in
tens of thousands visitors each year.]

All paying an entrance fee. Even
the irrigators are not allowed to view
the Lake without paying. It seems rather
ironic to us (the irrigators) that we
must consider recreation when they
do not contribute a cent to the payment
of the dam & surrounding area.

We have always made our payment
even when you (Bureau of Reclamation)
drained the dam (for power generation) and
we went without water for 2 years. Those
years set back the financial structure of

4. the farmers for years. [So if we (the irrigators)
are to use less water in the future, there
must be financial incentives to pay for them.]
We can do it, but must have help in
a large way - not with token programs.
We are giving up millions of dollars - so
must you!

1. Noted.

2. The District paid off construction costs of the distribution system in 1998 and is now paying off construction costs of the dam (the District pays yearly operation and maintenance costs of the unit, as well). The dam, delivery system, and other facilities of the Angostura Unit, however, are property of the United States; neither the District nor individual irrigators have equity in them.

3. Operation and maintenance costs of Angostura State Recreation Area are greater than the revenues from entrance fees. If South Dakota Department of Game, Fish and Parks were to collect fees greater than these costs, the surplus would be turned over to the U.S. Treasury. Construction costs were discounted because the Angostura Unit provides recreation benefits, thus indirectly benefitting the irrigators.

4. If the purposes of the Angostura Unit were changed, cost allocations would also be changed, resulting in irrigators being responsible for less of the cost.